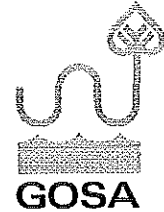


Groton Open Space Association, Inc.
P.O. Box 9187, Groton, CT 06340-9187
www.GOSAonline.org



Statement of the Groton Open Space Association
Groton, CT

Re: Proposed In-Stream Flow Regulation by the CT Department of Environmental Protection
January 20, 2010

The Groton Open Space Association (GOSA) strongly endorses the proposed in-stream flow regulation and urges its adoption.

GOSA is a non-profit membership organization with over 40 years of activity in Groton in support of protecting open space and promoting the ecological benefits of such protection. In recent years GOSA has focused strongly on the protection of Groton's waterways and watersheds. We have advised on a number of proposed developments in the town so that harmful erosion and paving will be reduced and the developments will not harm and destroy streams, wetlands and vernal pools. In some cases, we have opposed development because of the harm it will do to the reservoirs and watershed of our drinking water supply.

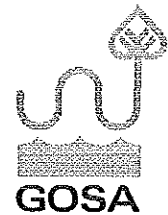
Groton is a town blessed with a relatively clean drinking water reservoir system. We also have a young oyster fishery in the town, which is growing successfully. Critical to both our water system and the oyster fishery is a healthy and clean stream system.

We applaud DEP's proposed in-stream flow regulation as a critically needed step by the state in what we hope is a long-term effort to implement better water management planning and regulation in the state. Too often, as in our town, the Plan for Conservation and Development gives far greater weight to planning for development than for conservation, even in critical watersheds that include our drinking water supply.

Furthermore, even though Connecticut has ample rainfall compared with many other parts of the country, as many as 60 of our rivers and streams are impaired by lower than natural flows or alterations to stream hydrological processes. With an ample amount of annual rain at roughly 45 inches a year, we should be able to husband our water resources in such a way as to guarantee healthy streams.

We applaud the proposed regulation as a science-based strategy for protecting in-stream flows, something the state has needed for decades. GOSA believes that overall the proposed regulation is very balanced to address human needs in the state as well as those of fish and wildlife. The list of 20 regulatory exemptions to protect human safety is ample. Indeed, if anything, these regulations bend too far in the direction of accommodating the existing status quo. In addition, we seriously question the proposal to create a Category 4 river, which would essentially condemn such designated rivers to death by neglect. There are many instances when apparently "lost" rivers have been redeemed in this country, and no river should be written off as beyond resuscitation.

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GOSA urges the DEP to move forward swiftly to finalize these regulations. We believe there is strong consensus by the citizens of the state that protection of our rivers and streams is a high priority.

Respectfully submitted,

A handwritten signature in cursive script that reads "Joan Smith".

Joan Smith, President
Groton Open Space Association, Inc.